

Lane Carter v. Jacque Derr  
Lane Carter

Page 1

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION

\* \* \* \* \*

LANE CARTER CIVIL ACTION NO. 3:18-CV-00068  
LA. DOC #15199

VS.

SECTION P

JUDGE TERRY A DOUGHTY

JACQUE DERR, ET AL MAGISTRATE JUDGE KAREN L. HAYES

\* \* \* \* \*

DEPOSITION OF

LANE CARTER

September 20, 2018

\* \* \* \* \*

The deposition of LANE CARTER, was taken in  
the above entitled cause, pursuant to the following  
stipulations, before Rheba Eppinette Gwin,  
Certified Court Reporter, State of Louisiana  
Certificate No. 2010027, at the Jackson Parish  
Correctional Center, 327 Industrial Drive,  
Jonesboro, Louisiana 71251-5498, on Thursday, the  
20th day of September 2018, beginning at 10:01  
a.m., and concluding at 11:50 a.m.

Lane Carter v. Jacque Derr  
Lane Carter

Page 2

1                           **A-P-P-E-A-R-A-N-C-E-S**  
2

3                           **FOR PLAINTIFF:**

4                           **LANE CARTER (15199), PRO SE**  
5                           **Jackson Parish Correctional Center**  
6                           **327 Industrial Drive**  
7                           **Jonesboro, Louisiana 71251-5498**

8                           **FOR DEFENDANT LASALLE CORRECTIONS, LLC AND SHERIFF**  
9                           **ANDY BROWN, SHERIFF OF JACKSON PARISH:**

10                          **PROVOSTY, SADLER & DeLAUNAY, APC**  
11                          **934 Third Street, 8th Floor**  
12                          **Alexandria, Louisiana 71309-1791**  
13                          **(318) 445-3631**

14                          **Appearing herein by and through**  
15                          **Mr. H. Bradford Calvit**  
16                          **bcalvit@provosty.com**

17                          **FOR DEFENDANT WINN PARISH POLICE JURY:**

18                          **GOLD, WEEMS, BRUSER, SUES & RUNDELL**  
19                          **2001 MacArthur Drive**  
20                          **Alexandria, Louisiana 71307-6118**  
21                          **(318) 445-6471**

22                          **Appearing herein by and through**  
23                          **Mr. Steven M. Oxenhandler**  
24                          **soxenhandlelr@goldweems.com**

25                          **APPEARING VIA CELL PHONE CONFERENCE CALL:**

1                          **FOR DEFENDANT SHERIFF ANDY BROWN, SHERIFF OF**  
2                          **JACKSON PARISH:**

3                          **USRY & WEEKS (NO)**  
4                          **1615 Poydras Street, Suite 1250**  
5                          **New Orleans, Louisiana 70112**  
6                          **(504) 592-4600**

7                          **Appearing herein by and through**  
8                          **Mr. Ronald Shane Bryant**  
9                          **sbyrant@usryweeks.com**

Lane Carter v. Jacque Derr  
Lane Carter

Page 3

I-N-D-E-X

## **EXAMINATION:**

## **RE-EXAMINATION:**

7	BY MR. OXENHANDLER . . . . .	135
8	BY MR. BRYANT . . . . .	139

**EXHIBITS :**

10	<b>Exhibit No. 1 -- Summons</b>	15
11	<b>Exhibit No. 2 -- Jackson Parish Ambulance</b>	
12	<b>Service</b>	17
13	<b>Exhibit No. 3 -- Photographs</b>	19
14	<b>JPCC Exhibit No. 1 -- Medical Refusal Form</b>	
15	(JPCC M74)	105
16	<b>JPCC Exhibit No. 2 -- Sick Call Request Form</b>	
17	(JPCC M75)	108

Lane Carter v. Jacque Derr  
Lane Carter

Page 4

1

## S-T-I-P-U-L-A-T-I-O-N

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3           It is stipulated that the deposition of LANE  
4           CARTER, is taken by counsel for the Defendants,  
5           pursuant to Notice, on Thursday, the 20th day of  
6           September 2018, before Rheba Eppinette Gwin,  
7           Certified Court Reporter, Certificate No. 2010027.

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The deposition is being taken pursuant to  
Notice and the Louisiana Code of Civil Procedure.

The parties hereto waive all formalities in connection with the taking of said deposition, except the swearing of the witness, and the reduction of the questions and answers to typewriting.

The witness, LANE CARTER, was advised of his right to read and sign this deposition, and he elected to waive that right.

\* \* \* \* \*

Lane Carter v. Jacque Derr  
Lane Carter

Page 75

1 A They gave me no other reason.

2 Q Okay.

3 A And that's when Mr. Williams told me that if I  
4 was -- that he -- in his opinion he didn't  
5 think that, you know, the sheriff was going to  
6 provide me with any medical treatment.

7 Q And how did that strike you?

8 A I was appalled. I was -- I was mad.

9 Q Did Sheriff Jordan ever communicate anything  
10 like that to you?

11 A No, sir. I did not see Sheriff Jordan again.

12 Q And so your -- and essentially, the genesis of  
13 the suit or the basis of the suit was your  
14 understanding that for whatever reason Sheriff  
15 Jordan had forbidden you from having medical  
16 care?

17 A Correct.

18 Q It may have been because he didn't like you.

19 It may have been because money.

20 A It could be a multitude of reasons. I don't  
21 know any of them.

22 Q All right. You had mentioned that you went to  
23 Jackson Correctional.

24 A Uh-huh.

25 Q How was that communicated to you and what --

Lane Carter v. Jacque Derr  
Lane Carter

Page 112

1       had mentioned that you had saw the nurse on  
2       the 13th. After you got to JPCC, did you see  
3       a nurse or a health care provider before the  
4       13th?

5     A     Yes, sir.

6     Q     And describe what happened during that?

7     A     They took my vitals, blood pressure, things  
8       like that, asked me, you know, medical  
9       history. I'd already filled out a sick call  
10      by then. I had mentioned it to them. The  
11      nurse pulled it, looked at it and said that  
12      within a few days she would have me back in  
13      her office to go over that.

14    Q     And then that's when you came back on the  
15      13th?

16    A     No, I -- I can't remember if there was a visit  
17      before the 13th or if it was straight to the  
18      13th.

19    Q     All right. During those three or four days --

20    A     Uh-huh.

21    Q     -- did your physical condition stay the same,  
22      get better or worsen?

23    A     It -- honestly, I -- it didn't get any better.  
24      I can't really say it got worse at that time,  
25      but I know it didn't get any better.

Lane Carter v. Jacque Derr  
Lane Carter

Page 113

1 Q But you were still walking around?

2 A Yes, sir. Yes, sir. I could walk all the way  
3 up until somewhere in October and then it just  
4 -- it hurt really bad and then my leg just  
5 went numb.

6 Q Okay. Now, you had mentioned earlier that you  
7 had a second fall --

8 A Yes, sir.

9 Q -- and in your mind it was because of the  
10 issues that arose after the first fall.

11 A Yes, sir.

12 Q Describe for me what issues had arisen after  
13 the first fall, but before this second.  
14 Medical issues.

15 A Medical issues? I mean, you want all of them?

16 Q Yeah.

17 A Okay. If I can remember correctly because  
18 there's been a lot of things wrong with me.  
19 It's been over a year. I'm in constant pain.  
20 I'm in absolute pain. My left arm is numb.  
21 My left knee --

22 Q No, no, not now. I'm talking about --

23 A I'm telling you things from way back. I mean,  
24 these are still --

25 Q No, no. No, here --

Lane Carter v. Jacque Derr  
Lane Carter

Page 131

1           **whichever building I happen to be in.**

2   **Q      You're talking about the nurse at JPCC?**

3   **A      Oh, yes. I'm sorry. Yes, sir. The JPCC**  
4       **nurses.**

5   **Q      Okay.**

6   **A      Now, I understand the whole security, we can't**  
7       **tell you where you're going or when. I get**  
8       **that. I mean, I understand that completely.**

9   **Q      Okay.**

10   **A     But as far as telling me oh, well we might**  
11       **know what's wrong with you, but we can't tell**  
12       **you because it's a threat to security. No,**  
13       **that -- I don't understand that.**

14   **Q      All right. I think that another key condition**  
15       **or aspect of your claim is that you believe**  
16       **that had you received different or better**  
17       **medical care you wouldn't be in the condition**  
18       **you're in.**

19   **A      Yes.**

20   **Q      What is that based on?**

21   **A      My opinion.**

22   **Q      Okay. You had mentioned you don't have any**  
23       **medical --**

24   **A      Exact --**

25   **Q      -- training.**

Lane Carter v. Jacque Derr  
Lane Carter

Page 134

1                   **WITNESS:**

2                    I have no objection to fill --

3                   **MR. CALVIT:**

4                   And we have an obligation to provide  
5                   you copies of everything we received.

6                   **WITNESS:**

7                   I understand that, yes, sir, but I  
8                   mean, I know what I'd be signing so I  
9                   have no problem with it.

10                  **MR. CALVIT:**

11                  All right. Shane, do you have any  
12                  questions?

13                  **MR. BRYANT:**

14                  I think I only have one question and  
15                  it -- you may have already answered this,  
16                  sir, but I just want to -- you know, it's  
17                  kind of spread out and I want to make  
18                  sure I'm clear about it.

19                   **EXAMINATION**

20                  **BY MR. BRYANT:**

21                  Q       From the day that you fell in Winn Parish to  
22                   today, have you ever seen or spoken to Sheriff  
23                   Jordan sinceince that day?

24                  A       Yes, I have.

25                  Q       When was that?

Page 135

1 A On different court visits.

2 Q So, you saw him on court visits? On --

3 A Yeah.

4 Q On those days that you saw him on those court  
5 visits, did you ever talk about your medical  
6 condition?

7 A I tried to.

8 Q And what -- what was said?

9 A Nothing. I would ask him if I could talk to  
10 him about my condition and he didn't respond  
11 to me.

12 Q Okay. So, you never -- never got a chance to  
13 talk to him about it.

14 A No, sir.

15 Q Is that correct then?

16 A That's correct.

17 Q Okay. And so when you say that Sheriff Jordan  
18 prevented you from getting medical treatment,  
19 you're basing that solely on things that other  
20 people told you. Right? Like Sheriff Jordan  
21 never told you you couldn't have medical  
22 treatment?

23 A That's correct.

24 Q Okay.

25 MR. BRYANT:

Lane Carter v. Jacque Derr  
Lane Carter

Page 136

1                   I think those are the only questions  
2                   I have, guys.

3                   MR. CALVIT:

4                   Sorry I let you down, Shane.

5                   MR. OXENHANDLER:

6                   I just have one follow-up question.

7                   EXAMINATION

8                   BY MR. OXENHANDLER:

9                   Q         The gap in the hole in the plastic floor that  
10                   was inserted into the shower, that was clear  
11                   and obvious to you whenever you took a shower?  
12                   You saw that hole?

13                  A         Yes. Eventually. I didn't -- like I said, I  
14                   don't know when it got there because I didn't  
15                   notice it the first few times I took a shower  
16                   and then I looked down one day and it was  
17                   there.

18                  Q         But every time afterwards you knew that that -  
19                   -

20                  A         Yeah.

21                  Q         -- hole was there?

22                  A         Well, it -- yeah, it was there.

23                  Q         Before --

24                  A         I mean, it couldn't go anywhere else. It was  
25                   there.

Lane Carter v. Jacque Derr  
Lane Carter

Page 144

1                   COURT REPORTER:

2                   Okay. I'll get a copy of your  
3                   information off the index then. And you  
4                   need a copy?

5                   MR. BRYANT:

6                   Okay, great.

7                   COURT REPORTER:

8                   Okay.

9                   MR. CALVIT:

10                  Thank you, Shane. I'll speak with  
11                  you later.

12                  MR. BRYANT:

13                  Thanks everybody. I appreciate it.

14                  MR. CALVIT:

15                  All right, sir. Appreciate your  
16                  time.

17                  WITNESS:

18                  Thank you, sir. Ma'am.

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DEPOSITION CONCLUDED AT 11:50 A.M.

Lane Carter v. Jacque Derr  
Lane Carter

Page 145

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**REPORTER'S PAGE**

2

3           **I, RHEBA EPPINETTE GWIN, Certified Court**  
4       **Reporter in and for the State of Louisiana, the**  
5       **officer, as defined in Rule 28 of the Federal Rules**  
6       **of Civil Procedure and/or Article 1434(B) of the**  
7       **Louisiana Code of Civil Procedure, before whom this**  
8       **proceeding was taken, do hereby state on the**  
9       **Record:**

10           That due to the interaction in the spontaneous  
11       discourse of this proceeding, dashes (--) have been  
12       used to indicate pauses, changes in thought, and/or  
13       talk overs; that same is the proper method for a  
14       Court Reporter's transcription of proceeding, and  
15       that the dashes (--) do not indicate that words or  
16       phrases have been left out of this transcript; that  
17       any words and/or names which could not be verified  
18       through reference material have been denoted with  
19       the phrase "(spelled phonetically)."

20

21

---

22           **RHEBA EPPINETTE GWIN**  
23           **Certified Court Reporter**

24

25